

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

J-SQUARED TECHNOLOGIES, INC., a)	
Canadian corporation, and J-SQUARE)	
TECHNOLOGIES (OREGON) INC., an)	
Oregon corporation,)	
)	
Plaintiffs,)	
v.)	C.A. No. 04-CV-960-SLR
MOTOROLA, INC., a Delaware corporation.)	
Defendant.)	

**EXHIBIT G TO
MOTOROLA'S RESPONSE TO PLAINTIFFS'
MOTION TO AMEND**

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Examination No. 06-0288.2

Court File No. CA 04-960-SLR

(District of Delaware)

IN THE UNITED STATES DISTRICT COURT

B E T W E E N:

J-SQUARED TECHNOLOGIES, INC., a Canadian Corporation, and
J-SQUARED TECHNOLOGIES (OREGON) INC., an Oregon Corporation

PLAINTIFFS

- and -

MOTOROLA, INC. A DELAWARE CORPORATION

DEFENDANT

DEPOSITION OF STEVEN BLOMME, pursuant to an appointment
made on consent of the parties to be reported by
Cornell•Catana Reporting Services, on March 21, 2006,
commencing at the hour of 1:34 in the afternoon.

APPEARANCES:

Sean J. Bellow

for the Plaintiffs

Randy Papetti and Emily S. Cates

for the Defendant

This Examination was taken down by sound recording
by Janice West at Ottawa, Ontario, Canada.

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91

1 476. Q. Where did you get then the revenue year to
2 date figures for the design wins on here?

3 A. I probably would have looked at Point of Sale
4 Reports.

5 477. Q. So you've got Point of Sale Reports?

6 A. I had access to Point of Sale Reports, yes.

7 478. Q. Access to where?

8 A. Sorry?

9 479. Q. I mean, who had the reports that you were
10 given access to?

11 A. They would have come from the Head Office,
12 from the Main Office -- yes, Julie Blair was copying me
13 for a while but I'm not sure she copied me every time, so
14 I would have ---

15 480. Q. So Julie Blair provided you on a regular
16 basis -- or a roughly regular basis the POS Reports for
17 your territory?

18 A. Correct, correct.

19 481. Q. Do you have any reason to believe that J-
20 Squared (Oregon) was underpaid for any commissions it
21 earned during the time the Agreement was in effect?

22 A. Underpaid for commissions that were due and
23 during the term of the Agreement?

24 482. Q. Correct?

25 A. No, I don't think so.